SAVE OUR SHORES

April 26, 2001

Donna Wieting, Chief of Marine Mammal Conservation Division
Office of Protected Resources
National Marine Fisheries Service
1315 East-West Highway
Silver Spring, MD 20910-3226

RE: Opposition to the Navy's request to deploy LFAS in the world's oceans and their request for a "small take exemption" under the Marine Mammal Protection Act.

Dear Ms. Wieting:

Save Our Shores (SOS) is a marine conservation organization representing thousands of members through out the Central Coast of California. Our mission is to *protect the ecological integrity of the Monterey Bay National Marine Sanctuary through policy research, education, and citizen action.* SOS is gravely concerned over the potential impacts associated with Low Frequency Active Sonar (LFAS) and the U.S. Navy's intent to deploy this technology in our world's oceans. The Navy's proposed deployment of its Low Frequency Active Sonar system poses a serious threat to marine mammals, and other ocean life. The National Marine Fisheries Service (NMFS) when making their decision should air on the side of resource protection and prevent this dangerous technology from being deployed.

This risky technology presents a serious and wide-ranging threat to marine life. A single LFAS transmitter would generate sound in the range of 230 decibels, flooding hundreds of square miles of ocean with noise. Two hundred thirty-five decibels is millions of times more intense than the 160-decibel level known to harm human divers. The sheer force of 230-decibel blasts could cause permanent hearing loss, serious physical injury, or even death to whales and other creatures unfortunate enough to be swimming near an LFAS transmitter. But what concerns marine scientists even more than physical injury are the impacts that LFAS could have on the behavior (such as breeding, feeding, and migration) and viability of entire populations of marine mammals. It is exactly these effects on vital activities, experienced over hundreds of miles of ocean, that pose the greatest risk to marine mammals.

This LFAS system is proven to cause significant negative impacts to marine life including whales, dolphins and other important species that live within the marine environment. The Navy's testing of the LFAS system at a level of 120-

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150dB documented deflection in migration patterns by gray whales inorder to avoid received levels of 140dB. It is important to note that these aversion levels are found at sound levels thousands of times lower than the Navy intends to deploy the system.

Dr. Marsha Green, of the Ocean Mammal Institute discussed the scientific aspects of LFAS at a recent symposium on undersea noise. She noted:

- The Navy's Environmental Impact Statement on Low Frequency Active Sonar is scientifically flawed. It ignores very relevant data such as mass stranding of beaked whales in Greece following NATO's LFAS test in 1996.

- Widely accepted research shows whales avoid loud sounds at about 115-120dB. With no scientific basis the Navy is attempting to redefine this level to 160 dB.

- The Navy conducted their LFAS tests at levels about 5,000 times less intensity and 70 times less pressure than their planned deployment levels and with no scientific evidence extrapolated that the technology is safe at much higher levels.

Other scientists such as Dr. Linda Weilgart, a well known marine biologist studying marine mammals and sound, highlights that marine mammals use underwater sound as their primary sensory mode and that even small changes to their hearing can cause significant behavioral changes. Marine mammals depend heavily on sound for communication, food finding, navigation, and predator detection, i.e. all aspects of their lives. The National Research Council's Committee on Low Frequency Sound and Marine Mammals recently concluded that the effects of low frequency sound on marine life may "...range between potential hearing damage and gradual deafness for the entire species-- and eventual extinction--or practically no discernible impact." The Navy's most recent studies have not adequately addressed the short-term and long-term impacts of the LFAS system on whales, dolphins, porpoises, sea turtles, and a host of other marine animals. With so many unanswered question regarding this technology it is imperative we do not allow LFAS in our oceans.

Furthermore, LFAS is a poorly conceived and highly vulnerable system that is outdated. On June 27, 2000 Rear Admirals Fages and Davis spoke before a subcommittee of the House Armed Services Committee saying the Navy now has two new passive listening systems (SURTASS Twin Line and Advanced Deployable System) that can detect quiet submarines at considerable distances where previously they were thought to be undetectable. These passive systems will not harm marine life and appear to be a safe alternative to LFAS. The use of safe, passive listening systems was not addressed in the Navy's EIS. By using the safe, passive detection systems and shutting down LFAS, the Navy can fulfill its mission for national security and be stewards of the seas.

The National Marine Fisheries Service has a responsibility to enforce the Marine Mammal Protection Act. I urge you to deny the Navy's request to deploy LFAS in the world's oceans and their request for a "small take exemption" under the Marine Mammal Protection Act.

Thank you for your consideration of these comments and please add Save Our Shores to your distribution list for all notices regarding this proposed action.

Sincerely,

Vicki Nichols,
Director of Policy and Research

cc: William Douros, Superintendent MBNMS
Congressman Sam Farr, 17th District, California
Assembly Member Fred Keeley, 27th District, California
State Senator Bruce Mcpherson, 15th District
U.S. Senator Barbara Boxer, California